

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

THOMAS BLAHA,

Defendant.

Civil Action No. 25-1569

**NOTICE OF MOTION FOR
LEAVE TO PROCEED
ANONYMOUSLY**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Jack McNeily with exhibits in support, and the Complaint herein, Plaintiff Jane Doe will move before this Court on a date and time to be designated by the Court, for an Order pursuant to Rule 10(a) of the Federal Rules of Civil Procedure permitting Plaintiff to proceed anonymously in these proceedings and maintain the name Jane Doe in the caption.

Dated: March 21, 2025
Chicago, Illinois

/s/ Jack McNeily
Jack McNeily
Priya Purohit (*pro hac vice* forthcoming)
LATHAM & WATKINS LLP
330 North Wabash Ave., Suite 2800
Chicago, IL 60611
Telephone: (312) 876-7700
Facsimile: (312) 993-9767
Email: Jack.McNeily@lw.com
Priya.Purohit@lw.com

Wenyi Gu
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: Wendy.Gu@lw.com

Attorneys for Plaintiff Jane Doe